

## **Exhibit H**

# MONTEREY COUNTY

## RESOURCE MANAGEMENT AGENCY



PLANNING DEPARTMENT, Mike Novo, Interim Director

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December 8, 2006

Anna Vega, City Manager  
City of Greenfield  
P.O. Box 127/45 El Camino Real  
Greenfield, CA 93927

Subject: City of Greenfield Sphere of Influence Update (PD060819)

Dear Ms. Vega:

Thank you for your letter dated October 31, 2006 responding to our comments regarding the City's proposed SOI boundary. In general, the City's responses do not provide adequate assurance that the County's standards will be met in the SOI areas. The County needs assurances from the City that, as development occurs, the City imposes on these developments conditions that address impacts to County facilities and needs for improvements in the area, and that the County will have opportunities to review and comment on projects and improvements that affect County facilities. Below are our detailed responses to the comments contained in your letter.

### General Comments

The City's letter states: *"The City completed its public review obligations on the proposed SOI boundary, and prepared and approved its General Plan in accordance with State law."* The County understands that the City adopted its General Plan Update and certified the corresponding EIR in May 2005. Accordingly, the County's initial comments regarding the SOI proposal were submitted by the Board of Supervisors on November 8, 2005 (since the County's land use departments/agency apparently did not submit comments on the General Plan or EIR). The City's response does not explain how the County's comments on the City's Preliminary Sphere of Influence evaluation were subsequently addressed by the City prior to submitting the current request. It is unclear how the City has completed its public review obligations on the proposed SOI boundaries. Isn't this the purpose of the current negotiations between the City and the County?

### Agricultural Buffers (Agricultural Commissioner and Planning Department)

Buffering Policies. The City's letter states: *"the Artisan Agriculture/Visitor Serving (AAVS) designation is an extremely low-intensity use that is compatible with agriculture and serves as an agricultural transition area to the north ... "... and has effectively used the AAVS designation and strong policies to provide adequate buffers city wide."*

The City's response does not provide adequate assurance that the County's standards for agricultural uses (Section 21.66.030) will be met in the SOI areas. In particular, it is unclear whether single-family residential is a permitted use in the AAVS designation. If so, what provisions are included in the AAVS district to meet the requirements of Section 21.66.030, including the requirement for a well-defined buffer zone? In addition, the City's response does not identify specific General Plan policies that "*provide adequate buffers city wide.*" This discussion should provide specifics regarding how adequate ag buffers will be provided in each area proposed to be included in the SOI. In particular, what ag buffers are proposed on the west side of the City?

### Planning Department

Financial Loss to the County. The City's response concludes that there is no further need to quantify fiscal changes. The City's responses to the County's comments applies only to the overall General Plan rather than to the specific issues that are raised by the proposed SOI expansion. In particular, how will the loss of important farmland be mitigated. Policy AG-1.12 in the draft Monterey County General Plan Update states:

*"The County shall prepare, adopt and implement a program that requires projects involving a change of land use designation resulting in the loss of Important Farmland (as mapped by the California Department of Conservation Farmland Mapping and Monitoring Program) to mitigate the loss of that acreage. The program may include rations, payment of fees, or some other mechanism. Until such time as the program has been established, projects shall mitigate the loss of Important Farmland on an individual basis as feasible as determined by the Agricultural Commissioner. A Community Plan or Rural Center Plan that includes a mitigation program shall not be subject to this policy."*

Phasing. The phasing of development in the areas proposed to be included in the SOI expansion needs to be addressed. In particular, how will adequate ag buffers be provided as the areas are developed? How will infrastructure and services be extended in a logical manner?

### Public Works Department

The City acknowledges that coordination with the County is necessary, and that more detailed review will be required as specific development projects are proposed. Public Works' main concerns are with our roadway facilities, and that any impacts to our facilities are addressed. We need assurances from the City of Greenfield that, as development occurs in Greenfield, the City imposes on these developments conditions that address impacts to our facilities and our needs for road improvements in the area, and that we have opportunities to review and comment on projects and improvements that affect County facilities. We would also like to encourage the City to utilize the TAMC fee as a means to address cumulative impacts to the regional roadway system. In their response, it was unclear whether or not they would utilize this fee program.

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#### Health Department

The Health Department has no additional comments at this time.

#### Water Resources Agency

MCWRA agrees with the Monterey County Health Department that when the wastewater treatment facility is expanded it should be upgraded to a tertiary treated wastewater facility. Such an upgrade would accomplish two things

1. When the Salinas River floods and overtops the holding ponds, they would contain only tertiary treated wastewater.
2. The tertiary wastewater could be used to provide irrigation water for any large landscaped areas such as median strips, parks, golf courses, etc. and nearby agricultural lands thus reducing ground water pumping in the area.

The build-out of the proposed Sphere of Influence would dramatically increase the impervious surface in the area thereby increasing stormwater runoff. As each development proposal comes forward, a drainage plan should be required that addresses the impacts to onsite and offsite properties so as not to increase flooding potential of the Salinas River.

We look forward to working with the City of Greenfield to resolve the issues regarding SOI boundary. If you have any questions, feel free to call me at (831) 755-5183.

Sincerely,

Bob Schubert, AICP  
Acting Planning and Building Services Manager

cc: Thom McCue, LAFCO Monterey County  
Kate McKenna, LAFCO Monterey County  
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